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11 Attorneys for Defendants
 12 Hynix Semiconductor Inc. and Hynix
 Semiconductor America Inc. in the *Sun/Unisys*,
Edge, Jaco and *All-American* actions

13
UNITED STATES DISTRICT COURT
 14
NORTHERN DISTRICT OF CALIFORNIA
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16 Sun Microsystems, Inc. v. Hynix Semiconductor 17 Inc., et al.	Case No. C 06-01665-PJH (Consolidated)
18 Case No. C-06-01665-PJH	Case No. C-06-02915-PJH
19 Unisys Corporation v. Hynix Semiconductor Inc., et al.	Case No. C-07-01200-PJH
20 Case No. C-06-02915-PJH	Case No. C-07-01207-PJH
21 Jaco Electronics, Inc. v. Hynix Semiconductor Inc., et al.	Case No. C-07-01212-PJH
22 Case No. C-07-01212-PJH	Case No. C-07-01381-PJH
23 Edge Electronics, Inc. v. Hynix Semiconductor Inc., et al.	[PROPOSED] PRETRIAL ORDER NO. 1
25 Case No. C-07-01207-PJH	
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1 All-American Semiconductor, Inc. v. Hynix
2 Semiconductor Inc., et al.

3 Case No. C-07-01200-PJH

4 DRAM Claims Liquidation Trust, by its Trustee
5 Wells Fargo Bank, NA v. Hynix Semiconductor
Inc., et al.

6 Case No. C-07-01381-PJH.

7 On May 31, 2007, the Court held a joint Case Management Conference for
8 each of the six cases listed herein. Plaintiffs Sun, Unisys, Edge, Jaco and All-American
9 were represented by Crowell & Moring LLP and plaintiff DRAM Claims Liquidation
10 Trust was represented by Lindquist & Vennum LLP and Sellar, Hazard, Manning, Ficenec
11 & Lai.

12 Defendants Hynix Semiconductor Inc. and Hynix Semiconductor Inc. were
13 represented by O'Melveny & Myers LLP with respect to the Sun, Unisys, Edge, Jaco and
14 All-American actions; defendants Mosel Vitelic Inc. and Mosel Vitelic Corporation were
15 represented by Heller Ehrman LLP; defendants Samsung Electronics Co., Ltd. and
16 Samsung Semiconductor, Inc. were represented by Sheppard, Mullin, Richter & Hampton
17 LLP; defendants Infineon Technologies AG and Infineon Technologies North America
18 Corporation were represented by Kaye Scholer LLP; defendants Nanya Technology
19 Corporation and Nanya Technology Corporation USA were represented by Orrick
20 Herrington & Sutcliffe LLP; defendants Winbond Electronics Corporation and Winbond
21 Electronics Corporation America were represented by Finnegan, Henderson, Farabow,
22 Garrett & Dunner LLP; defendants Elpida Memory, Inc. and Elpida Memory (USA) Inc.
23 were represented by Simpson Thacher & Bartlett LLP; defendant NEC Electronics
24 America, Inc. was represented by Thelen Reid Brown Raysman & Steiner LLP;
25 defendants Mitsubishi Electric Corp.. Mitsubishi Electric and Electronics USA, Inc., and
26 Mitsubishi Electric Europe B.V. were represented by Jenner & Block LLP and Krieg,

1 Keller, Sloan, Reilley & Roman, LLP; and defendants Micron Technology, Inc, and
 2 Micron Semiconductor Products, Inc. were represented by Gibson Dunn & Crutcher LLP.

3 1. The Court adopts the following pre-trial schedule for these cases.

4 Unless otherwise stated, each date below applies to every action listed above.

EVENT	COORDINATED SCHEDULE
Exchange Initial Disclosures in <i>Jaco, Edge All-American and DRAM Liquidation Trust</i> actions; MDL Defendants will produce MDL materials	6/14/07
Group mediation with Unisys	6/20/07
Group mediation with Sun	6/21/07
Follow-up mediations in <i>Sun/Unisys</i> actions	7/19/07 – 7/20/07
Fact discovery closes in all cases	11/16/07
Deadline for mediation in <i>Edge, Jaco, All-American and DRAM Liquidation Trust</i>	11/30/07
Deadline for Plaintiffs' expert reports	12/14/07
Depositions of Plaintiffs' experts	12/15/07-1/24/08
Deadline for Defendants' expert reports	1/25/08
Depositions of Defendants' experts	1/26/08-2/21/08
Deadline for Plaintiffs' expert rebuttal reports	2/22/08
Depositions of Plaintiffs' rebuttal experts	2/23/08-3/13/08
Deadline for dispositive motions	3/14/08
Deadline for Oppositions to dispositive motions	4/11/08
Deadline for Reply briefs in support of dispositive motions	4/30/08
Hearing held on dispositive motions	5/28/08
Pre-Trial Conference	9/11/08
Cases ready for trial; court to determine which case goes first	10/20/08

25 2. Any discovery disputes are referred to Magistrate Judge Spero for
 26 resolution.

27 3. Defendants are entitled to commence depositions of plaintiffs'
 28 experts when they file reports. If an expert submits both an expert report and a rebuttal

1 report, defendants are permitted to take a second deposition of that expert. A second
 2 deposition of an expert for plaintiffs following submission of a rebuttal report shall be
 3 limited to one-half day.

4. On June 4, 2007 defendants filed Motions to Dismiss in the
 5 *Sun/Unisys* consolidated action and in the *DRAM Liquidation Trust*. Pursuant to the
 6 Court's request, the parties have agreed to a briefing and hearing schedule for those
 7 motions to dismiss as follows:

EVENT	SCHEDULE
Defendants' motions to dismiss filed	6/04/2007
Plaintiffs' opposition briefs filed	7/16/2007
Defendants' reply briefs filed	8/13/07
Hearing on each motion	9/12/07

14 SO ORDERED.

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 16 Dated: 6/25/07
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